

Jonathan Sexton

From: Jonathan Sexton
Sent: Thursday, December 8, 2016 5:16 PM
To: Bennett, Jo
Cc: aleksandra@bronsted.com
Subject: Elezovic v. Chalabi
Attachments: P's 2ND RTP to D.pdf

Jo,

I have communicated your offer to my clients and am awaiting their response. In the meantime, it might be beneficial to motivate your clients to more readily pay and pay quickly if they were reminded that there is personal liability of corporate officers and shareholders for violation of FLSA claims as set forth in *Lamonica v. Safe Hurricane Shutters, Inc.* 711 F3d 1299 (11th Cir. 2013). While not named in the suit, it would certainly be appropriate to move to amend the claim to add them as parties if the corporate defendant is tanking. To that end, I have attached Plaintiffs' 2nd Request for Production of Documents seeking documents that verify the names and addresses of shareholders and corporate officers since January 1, 2013. Because it was not included in our original discovery, I am also seeking a copy of any insurance policy which may be providing any type of coverage. The certificate of serving discovery will be filed tomorrow. Hopefully, I can get back to you tomorrow with a response from my clients.

Jonathan P. Sexton

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